1		THE HONORABLE THOMAS S. ZILLY
2		
3		
4		
5		
6		
7	e.s. bistract cockt	
8	WESTERN DISTRICT	T OF WASHINGTON
9	RICHARD A. GEIER, individually and on behalf of all others similarly situated,	
10	Plaintiff,	NO. 2:13-cv-00354 TSZ
11		PLAINTIFF'S MOTION FOR CLASS CERTIFICATION
12	W-QUBE, INC.; MOBILE MESSENGER AMERICAS, INC., d/b/a MOBILE MESSENGER; and JOHN DOES 1-20,	
13		Note on Motion Calendar: 11/07/2014
14		
15	Defendants.	
16		
17	Plaintiff's Motion for Class Certification	n has been filed under seal pending resolution of
18	Plaintiff's Motion to File "Confidential" Docum	nents in Support of Plaintiff's Motion for Class
19	Certification Under Seal or in Open Court (Dkt.	. # 77).
20		
21		
22		
23		
24		
25		
26		
27		
		TERRELL MARSHALL DAUDT & WILLIE PLLC
	Tild the state of	

1		
2	RESPECTFULLY SUBMITTED AND DATED this 16th day of October, 2014.	
3	TERRELL MARSHALL DAUDT & WILLIE PLLC	
4		
5	By: <u>/s/ Toby J. Marshall, WSBA #32726</u> Toby J. Marshall, WSBA #32726	
6	Email: tmarshall@tmdwlaw.com	
	Jennifer Rust Murray, WSBA #36983 Email: jmurray@tmdwlaw.com	
7	Erika L. Nusser, WSBA #40854 Email: enusser@tmdwlaw.com	
8	936 North 34th Street, Suite 300	
9	Seattle, Washington 98103-8869	
10	Telephone: (206) 816-6603 Facsimile: (206) 350-3528	
11	Darrell W. Scott, WSBA #20241	
12	Email: darrellscott@mac.com	
13	Matthew J. Zuchetto, WSBA #33404 Email: matthewzuchetto@mac.com	
14	THE SCOTT LAW GROUP, P.S.	
15	Chronicle Building, Suite 680 926 West Sprague Avenue	
	Spokane, Washington 99201	
16	Telephone: (509) 455-3966 Facsimile: (509) 455-3906	
17	Attorneys for Plaintiff	
18		
19		
20		
21		
22		
23		
24		
25		
26		
27		

1	CERTIFICATE OF SERVICE	
2	I, Toby J. Marshall, hereby certify that on October 16, 2014, I electronically filed the	
3	foregoing with the Clerk of the Court using the CM/ECF system which will send notification of	
4	such filing to the following:	
5	Stephen M. Rummage, WSBA #11168	
6	E-mail: steverummage@dwt.com DAVIS WRIGHT TREMAINE LLP	
7	1201 Third Avenue, Suite 2200	
8	Seattle, Washington 98101-3045 Telephone: (206) 622-3150	
9	Facsimile: (206) 757-7700	
10	Alan D. Sege, <i>Admitted Pro Hac Vice</i> Email: alan.sege@mobilemessenger.com	
11	6601 Center Drive West Suite 700	
12	Los Angeles, California 90045 Telephone: (310) 957-3301	
13	Attorneys for Defendants M-Qube, Inc., and Mobile Messenger Americas, Inc.	
14	Colin G. Prince, WSBA #43166	
15	E-mail: colinprince@dwt.com DAVIS WRIGHT TREMAINE LLP	
16	1201 Third Avenue Suite 2200 Seattle, WA 98101-3045	
17	Telephone: (206) 622-3150 Facsimile: (206) 757-7700	
18	Attorneys for Mobile Messenger Americas, Inc., d/b/a Mobile Messenger	
19	DATED this 16th day of October, 2014.	
20	TERRELL MARSHALL DAUDT	
21	& WILLIE PLLC	
22	By: /s/ Toby J. Marshall, WSBA #32726	
23	Toby J. Marshall, WSBA #32726 Email: tmarshall@tmdwlaw.com	
24	936 North 34th Street, Suite 300	
25	Seattle, Washington 98103-8869 Telephone: (206) 816-6603	
26	Facsimile: (206) 350-3528	
27	Attorneys for Plaintiff	

TERRELL MARSHALL DAUDT & WILLIE PLLC
936 North 34th Street, Suite 300
Seattle, Washington 98103-8869
TEL. 206.816.6603 • FAX 206.350.3528
www.tmdwlaw.com

CASE No. 2:13-CV-00354 TSZ